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2015 SEP 29 P 3:15

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN-DETROIT

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

CITY OF DETROIT, MICHIGAN,

Debtor

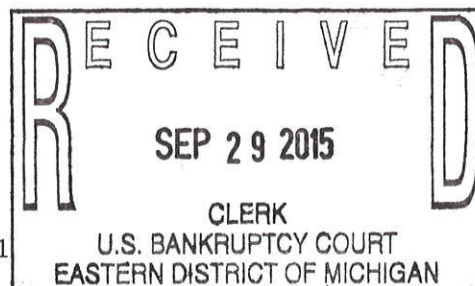
Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**EX PARTE MOTION TO FILE A PAPER RESPONSE TO THE MOTION  
OF THE CITY OF DETROIT (R. 10183) FOR AN INJUNCTION  
REQUIRING THE SENIOR ACCOUNTANTS, ANALYSTS AND  
APPRAISERS' ASSOCIATION (SAAA) TO WITHDRAW A GRIEVANCE  
ON BEHALF OF ITS MEMBER CEDRIC COOK**

1. The City of Detroit has filed a motion requesting the SAAA to withdraw with prejudice a grievance that the SAAA filed protesting the post-petition discharge from employment of its member Cedric Cook.
2. The SAAA is a small labor organization representing employees of the City of Detroit. It is not affiliated with any national or statewide labor organization.
3. In the attached brief, the SAAA asserts that this Court should deny the City's motion because the grievance it filed concerns events that occurred after the petition was filed and is protected, not barred, by the Plan of Adjustment and by this Court's Confirmation Order.




4. The SAAA cannot file this answer under the Court's ECF system because the undersigned attorney has not been trained or certified to be a part of that system.

5. In addition to the fact that there are no ECF classes scheduled before the due date for the SAAA's answer (September 29, 2015), the undersigned attorney has practiced for 39 years, has never had occasion to appear in the United States Bankruptcy Court, and does not anticipate having further occasions to appear in this Court after this motion is decided.

6. For the foregoing reasons, the SAAA asks permission to file its brief in response to the City's motion in paper. The original of the SAAA's response, the exhibits attached to it, and a proposed order are attached to this motion.

By the SAAA's Attorneys,  
SCHEFF & WASHINGTON, P.C.

BY:   
George B. Washington (P-26201)  
615 Griswold, Suite 910  
Detroit, Michigan 48226  
(313) 963-1921

Dated: September 29, 2015

## CERTIFICATE OF SERVICE

George B. Washington certifies that he served a copy of the foregoing Brief on Behalf of the Senior Accountants, Analysts and Appraisers' Association in response to the City's request for an injunction to block an arbitration proceeding by hand delivering it to counsel for the City of Detroit at the following address:

Mark N. Swanson  
Miller, Canfield, Paddock and Stone, PLLC  
150 West Jefferson, Suite 2500  
Detroit, MI 48226

  
George B. Washington (P-26201)

Dated: September 29, 2015

**EXHIBIT 1—PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:

Bankruptcy Case No. 13-53846

CITY OF DETROIT, MICHIGAN,

Honorable Thomas J. Tucker

Debtor

Chapter 9

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**[PROPOSED] ORDER GRANTING THE SENIOR ACCOUNTANTS,  
ANALYSTS AND APPRAISERS' ASSOCIATION'S MOTION TO FILE A  
PAPER RESPONSE TO THE CITY OF DETROIT'S MOTION (R. 10183)  
FOR AN INJUNCTION REQUIRING THE SENIOR ACCOUNTANTS,  
ANALYSTS AND APPRAISERS' ASSOCIATION(SAAA) TO WITHDRAW  
A GRIEVANCE FILED ON BEHALF OF ITS MEMBER CEDRIC COOK**

This matter having come before the Court on the Senior Accountants,  
Analysts and Appraisers' Association's motion to file a paper response to the City  
of Detroit's motion to require it to withdraw a grievance filed on behalf of its  
member Cedric Cook, and the Court being fully advised in the premises,

THE COURT ORDERS THAT the motion to file a paper response is  
granted.

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HONORABLE THOMAS J. TUCKER  
UNITED STATES BANKRUPTCY JUDGE